

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**IN RE: NEW ENGLAND
COMPOUNDING PHARMACY,
INC. PRODUCTS LIABILITY LITIGATION**

Master Docket No. 1:13-MD-2419-FDS

This Document Relates to:

*Jose A. Ramos v. New England Compounding
Pharmacy, Inc., Nitesh Bhagat ,et al., 1:13-CV-10410-FDS*
and

*Juanita Rivera and Anthony Rivera v. New England Compounding
Pharmacy, Inc., Nitesh Bhagat, et al., 1:13-CV-10412-FDS*

APPEARANCE

Please enter the appearance of John M. Lovely of the law firm Cashman and Lovely, P.C. as
counsel for Defendant, Nitesh Bhagat, M.D., effective immediately.

Respectfully submitted,

/ s / John M. Lovely

John M. Lovely, Esq., (BBO# 548223)
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Dated: May 2, 2013

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MOTION TO ADMIT *PRO HAC VICE*

Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for District of Massachusetts, John Lovely, Esq., a member in good standing of the bars of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts, hereby moves for an Order allowing the admission *pro hac vice* of Joseph R. Lang, Esq., who represents the interests of the Defendant, Dr. Nitesh Bhagat, in these actions.

Joseph R. Lang, Esq., is a member in good standing of the bars of the State of New Jersey and the United States District Court for District of New Jersey. He is a partner in the law firm of Lenox, Socey, Formidoni, Giordano, Cooley, Lang & Casey, LLC, 3131 Princeton Pike, Building 1B, Suite 104, Lawrenceville, New Jersey, 08648. Mr. Lang has been retained to represent Dr. Nitesh Bhagat in these cases.

There are no pending disciplinary proceedings against Mr. Lang in any state or federal court. Mr. Lang is familiar with the Local Rules of the United States District Court for District of

Massachusetts. Please refer to the enclosed Certification of Joseph R. Lang, Esq. attached and incorporated by reference.

The undersigned will serve as local counsel for Dr. Bhagat in this matter. The required filing fee in the amount of \$100.00 has been paid.

WHEREFORE, the Defendant, Nitesh Bhagat, M.D., respectfully requests that the Court allow the admission *pro hac vice* of Joseph R. Lang, Esq.

Respectfully submitted,

/ s / John M. Lovely

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**CERTIFICATION OF JOSEPH R. LANG, COUNSEL TO BE
ADMITTED PRO HAC VICE**

1. Pursuant to Local Rule 83.5.3, I submit this certification to the Court in support of the Motion to Admit me *Pro Hac Vice* and as part of my application for leave to practice in this Court and to appear and participate in the action on behalf of the defendant, Dr. Nitesh Bhagat, who I have been retained to represent.

2. I am admitted, practicing and in good standing as a member of the Bar of the State of New Jersey.

3. I am admitted, practicing and in good standing as a member of the Bar of the United States District Court for the District of New Jersey.

4. I have never been subject to any disciplinary action and there are no disciplinary proceedings pending against me as a member in any jurisdiction.

5. I have been retained by Dr. Bhagat's insurance company to represent him in the medical malpractice portion of the above referenced cases and even attempted to file Answers on his behalf in the State Court but the cases had already been removed to Federal Court.

6. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

I declare under the penalty of perjury that the foregoing is true and correct.

DATE: May 1 , 2013

/s/ Joseph R. Lang

Joseph R. Lang, Esq.
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& Casey, LLC
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CERTIFICATE OF SERVICE

I, John Lovely, Esq., hereby certify that on May 2, 2013, I caused a copy of the foregoing Appearance and Motion to be served electronically to all counsel of record.

DATE: May 2 , 2013

/s/ John M. Lovely

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